

Sander L. Esserman (Admitted *Pro Hac Vice*)
Robert T. Rousseau (Admitted *Pro Hac Vice*)
Peter D'Apice
Jo E. Hartwick (Admitted *Pro Hac Vice*)
STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA,
A PROFESSIONAL CORPORATION
2323 Bryan Street, Suite 2200
Dallas, Texas 75201
Telephone: (214) 969-4900
Facsimile: (214) 969-4999

Presentment Date: August 3, 2010

Counsel for Dean M. Trafelet in his
Capacity as Legal Representative for Future Asbestos
Personal Injury Claimants

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
)
In re)
)
MOTORS LIQUIDATION COMPANY, et al.,)
f/k/a GENERAL MOTORS CORP., et al.,)
)
)
Debtors.)
-----X Case No. 09-50026 (REG)
)
)
)
 Jointly Administered

**NOTICE OF PRESENTMENT OF ORDER PURSUANT TO
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE COMPELLING THE PRODUCTION
OF DOCUMENTS BY, AND DEPOSITION OF, THE DEBTORS AND NEW GM**

PLEASE TAKE NOTICE, that Dean M. Trafelet (the “**Future Claimants’ Representative**”), as legal representative for holders of future asbestos personal injury claims against the **Debtors** in the above-captioned jointly administered chapter 11 cases will present the annexed order compelling the production of documents by, and scheduling the depositions of individuals designated by the **Debtors**¹ and **New GM** and believed to have knowledge of the relevant matters, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, for signature

¹ Terms in bold not defined herein are ascribed the definition set forth in the **Application**.

and approval to the Honorable Robert E. Gerber, United States Bankruptcy Judge, Southern District of New York, at Room 621 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408, on August 3, 2010, at noon (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE, that unless a written objection to the proposed order is filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-2542 and the User's Manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official Website for the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Wordperfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), and served in accordance with General Order M-242, and served upon Peter C. D'Apice, Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201, to allow actual receipt of the foregoing by no later than August 3, 2010 at 11:30 a.m. (Prevailing Eastern Time), the order may be signed.

PLEASE TAKE FURTHER NOTICE, that if timely objections are filed and served, or if the Court so directs, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct.

Dated: July 20, 2010

**STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA,
A Professional Corporation**

By: /s/ Peter C. D'Apice
Sander L. Esserman (Admitted *Pro Hac Vice*)
Robert T. Brousseau (Admitted *Pro Hac Vice*)
Peter C. D'Apice
Jo E. Hartwick (Admitted *Pro Hac Vice*)

2323 Bryan Street, Suite 2200
Dallas, Texas 75201-2689
Telephone: (214) 969-4900
Facsimile: (214) 969-4999

**ATTORNEYS FOR DEAN M. TRAFELET IN HIS
CAPACITY AS LEGAL REPRESENTATIVE FOR
FUTURE ASBESTOS PERSONAL INJURY
CLAIMANTS**